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6
7 **IN THE UNITED DISTRICT COURT**
8 **FOR THE NORTHERN MARIANA ISLANDS**

9 **UNITED STATES OF AMERICA,**
10 **Plaintiff,**

11 **vs.**

12 **SABLAN CONSTRUCTION**
13 **COMPANY, LTD. and SABLAN**
14 **ENTERPRISES, INC.,**
15 **Defendant.**

CIVIL CASE NO.: 08-00015
SABLAN ENTERPRISES'
ANSWER TO AMENDED
COMPLAINT

16 Sablan Enterprises, Inc. ("SEI"), by and through counsel, answers Plaintiff's
17 Amended Complaint as follows:

- 18 1. SEI admits the allegations in paragraphs 1, 2, 3, 5 and 61 through 93 of the
19 Amended Complaint.
20 2. SEI denies the allegations in paragraphs 4 and 11 through 60 of the Amended
21 Complaint for lack of sufficient information to form a belief as to the truth of the
22 allegations therein.
23 3. SEI denies the allegations in paragraphs 6, 7, 6, 7, 8, and 9 of the Amended

1 Complaint.

2 4. All allegations not specifically admitted to herein are denied.

3
4 Affirmative Defenses

5 Defendant gives notice that it intends to rely upon the affirmative defense of:

6 A. SEI was not notified of the alleged violations in Count 7 of the Amended
7 Complaint.

8 B. Laches

9 C. Statute of limitations

10 D. Waiver

11 E. Estoppel

12 F. Failure to state a claim upon which relief can be granted.

13 Prayer

14 Wherefore, SEI prays for the Amended Complaint to be dismissed for other
15 equitable relief.

16 Dated this 27th day of June, 2008.

17
18 /s/
Perry B. Inos
Counsel for Sablan Enterprises, Inc.